

August 10, 2025

**Continued Abusive Discovery Practices / Request For Sanctions**

Judge Liman,

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a nonparty in Lively v. Wayfarer Studios LLC (1:24-cv-10049) to respectfully inform the Court of persistent, pervasive and perverse discovery practices by Ms. Lively's lawyers.

Seeing as Ms. Lively dragged me into this legal mess, I feel it is imperative to once again remind this Court of behavior that I believe is unethical from her lawyers.

On August 8th, Mr. Gottlieb filed with this Court the unredacted personal phone numbers of multiple nonparty individuals in this litigation. *See Docket #587 - Exhibit D, Exhibit E and Exhibit H.*

Mr. Gottlieb could have filed a redacted version of this on the public court docket and the unredacted version under seal. He did not.

He knew better and made the informed choice to behave deplorably.

This is a pattern of behavior that has been ongoing since the beginning of this litigious nightmare.

As your Honor himself shared publicly on August 8th, accompanying your ruling to strike Ms. Lively's deposition transcript: *The Second Circuit has explained that a court's supervisory function over its docket "is not only within a district court's power, but also among its responsibilities."* *Brown v. Maxwell*, 929 F.3d 41, 51 (2d Cir. 2019). *Courts must therefore protect the judicial process from Case 1:24-cv-10049-LJL Document 582 Filed 08/08/25 Page 2 of 4 3 being "coopted" and ensure that their dockets "are not used to gratify private spite or promote public scandal.*

Is there a reason why the private phone numbers of nonparty individuals should be on the public Court docket?

Is it not your Honor's role and responsibility to monitor such things and ensure the docket is free of spite?

As this pertains to me and my communications with this Court, I am showing a consistent pattern of abuse by Ms. Lively's legal counsel. Hence I have *repeatedly* called for sanctions against them. All of those requests have been ignored by your Honor.

Last week this Court admonished Mr. Baldoni's counsel for attaching Ms. Lively's deposition transcript in full, yet your Honor allowed her attorneys to use this Court's docket as "a means to promote public scandal" when Ms. Lively's lawyers dumped over four hundred pages of unrelated and irrelevant legal documents pertaining to actor Vin Diesel. *See Docket #402 - Exhibit B.*

For the reasons stated above and in my letter sent to you earlier today, I move this Court to impose the strongest sanctions on Mr. Gottlieb, Ms. Hudson and all of Blake Lively's lawyers. Your Honor has the power to sanction and doing so would send a needed message that this unethical and HURTFUL behavior from Ms. Lively's legal team must stop.

It is not only wrong, but this pattern of abuse by Ms. Lively's attorneys exposes nonparties in this litigation to potential harassment, abuse and legitimate safety concerns.

Additionally, for the record, I am pointing out - yet again - why I had no reason to believe Ms. Lively's legal team would protect my sensitive personal information. Why would they? They continue to publicly dox nonparties in this litigation, as recently as August 8th. And your Honor is allowing this - unchecked.

*Respectfully* submitted,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton